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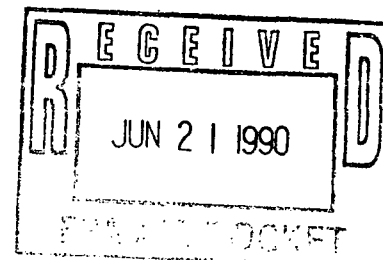
CLARK OIL & REFINING CORPORATION

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June 6, 1990

Mr. William K. Reilly
The U.S. Environmental Protection
Agency
401 M Street S.W.
Washington, D.C. 20460



Dear Mr. Reilly:

Clark Oil supports the Hitech 3000 waiver application to allow use of 0.03125 gm/gallon in unleaded fuel. This product increases the octane of unleaded gasoline significantly when added at that extremely low dosage.

The use of this octane enhancer will enable refiners to obtain increased volume from a barrel of crude oil. It will save energy required for high severity processing and reduce the production of butane and lighter ends which are unwanted by-products of increased reformer severity.

Our studies show that Clark Oil and other refiners would be able to increase gasoline production by 1-4% by either reducing severity on the reformers or by blending more low octane components such as natural gasoline. In either case the aromatic concentration in the gasoline would be reduced by 2-4%. The average refinery makes 50% gasoline yield from a barrel of crude. Therefore, crude requirements for the same gasoline production would be reduced by 2-8%. Imported gasoline products could also be reduced.

Since the detailed 48 car study performed by Ethyl Corporation indicates that Hitech 3000 does not contribute to failure in emission control systems and causes a significant reduction in tailpipe emissions, Clark believes this product should be given a waiver to be used at the .03125 gm/gal level. Use of this product should result in lower emissions and therefore cleaner air as well as enable the U.S. Refining Industry to produce gasoline at higher yield and efficiency at lower cost.

Clark Oil thanks you for the opportunity to express our views on this important topic.

Very truly yours,

RSC/kw